



July 15, 2016

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

**Subject: June 2016 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**



WA3019
14F
7.15.16

Dear Ms. Palumbo:

This letter provides the June 2016 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from June 15, 2016, to July 14, 2016.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The recirculation trench continues to operate as designed with a total flow rate of approximately 50 gpm from recirculation wells EW-01, EW-02, EW-04 and EW-05. There have been no high alarms since rehabilitation of the system in July 2015.
- The oxygen tanks in the iSOC wells will be replaced in early August.
- Groundwater monitoring was conducted on June 5 and 6. Analytical data was received from the ALS Laboratory and will be reported after data validation is completed.
- The Hanner property was sold to Yacht Properties. This property has no soil contamination associated with the RCRA project, but does have a groundwater plume beneath the property. Baxter will continue to have access to the monitoring wells on the Hanner property for replacing iSOCs, well maintenance, and monitoring. Should other remedial activities be required, access will be provided as appropriate.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period.
- EPA will provide the Baxter team with the Battelle report, when completed, and set up a technical meeting to discuss the path forward.



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Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Results from the July sampling event will be reported upon validation in the next monthly progress report.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

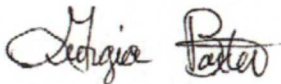
Name: Georgia Baxter

Title: Chief Executive Officer

Date: July 15, 2016

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group

